THIS IS THE <u>BEGINNING</u> OF ADMINISTRATIVE FINE CASE # 3278

March 28, 2017

### **MEMORANDUM**

# **SENSITIVE**

TO:

The Commission

THROUGH:

Alec Palmer

Staff Director

FROM:

Patricia C. Orrock DC PCO

Chief Compliance Officer

Debbie Chacona DC Assistant Staff Director Reports Analysis Division

BY:

Kristin D. Roser/Ben Holly BH

Reports Analysis Division II for KDR

Compliance Branch

SUBJECT:

Reason To Believe Recommendation - 2016 30 Day Post-General Report

(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2016 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2016 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report : within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2016 through November 28, 2016 (59 days). was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 32.2% (19 days (12G Filing Period)/59 days (30G Filing Period)).

• The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 20, 2017. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.

### Recommendation

- 1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- 2. Send the appropriate letters.

# Federal Election Commission Reason to Believe Circulation Report 2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

| AF#  | Committee<br>ID | Committee Name  | Candidate Name   | Treasurer             | Threshold     | ÞΛ  | Receipt Date | Days Late | LOA                | RTB Penalty |
|------|-----------------|---|------------------|-----------------------|---------------|-----|--------------|-----------|--------------------|-------------|
| 3253 | C00623256       | AMERICA COMES FIRST PAC   |                  | DAVID W.<br>SCHAMENS  | \$463,211     | 0   | 12/14/2016   | 9         | \$5,491            | \$101       |
| 3254 | C00461624       | ARTICLE 1 POLITICAL ACTION COMMITTEE                                      |                  | RICK GALENA           | \$182,587     | 0   | 12/29/2016   | 21        | \$27,300           | \$823       |
| 3255 | C00559146       | BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC)                              |                  | JERED TAYLOR          | \$206,543     | 0   | 1/26/2017    | Not Filed | \$9,042            | \$392       |
| 3256 | C00531285       | BRADY VICTORY FUND  | KEVIN BRADY      | MICHAEL J.<br>KARLINS | \$2,174,702   | 0   | 12/14/2016   | 9         | \$150,642          | \$2,360     |
| 3257 | C00496927       | CITIZENS SUPER PAC FOR AMERICA (CSPAC)                                    |                  | SIDDIQ MUMIN          | \$232,710     | 1   |              | Not Filed | \$46,542 (est)     | \$1,470     |
| 3258 | C00109595       | COMMUNICATION WORKERS<br>OF AMERICA LOCAL 13000                           |                  | MARISA<br>MACCRORY    | \$460,660     | 0   | 1/5/2017     | 28        | \$23,264           | \$307       |
| 3259 | C00388181       | CONNELL FOLEY PAC A NEW<br>JERSEY NON-PROFIT<br>CORPORATION               |                  | JOHN P. LACEY         | \$123,191     | 0   | 1/31/2017    | Not Filed | \$2,500            | \$326       |
| 3260 | C00191288       | DC REPUBLICAN PARTY FEDERAL ACCOUNT                                       |                  | RODERICK<br>JOHNSON   | \$158,584     | . 0 | 1/17/2017    | Not Filed | \$870              | \$326       |
| 3261 | C00146605       | FARMERS' RICE<br>COOPERATIVE FUND   |                  | BILL TANIMOTO         | \$156,561     | 0   | 12/16/2016   | 8         | \$8,200            | \$113       |
| 3262 | C00605634       | FLORIDIANS FOR A GOOD ECONOMY   | •                | ERIC W.<br>ROBINSON   | \$125,454     | 0   | 1/30/2017    | Not Filed | \$2,380            | \$326       |
| 3263 | C00404350       | FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION                 |                  | SHARLYN<br>WOODY      | \$147,245     | 0   |              | Not Filed | \$24,625 (est)     | \$654       |
| 3264 | C00385740       | FROZEN FOOD POLITICAL ACTION COMMITTEE                                    |                  | ALISON REICH<br>BODOR | \$149,916     | 0   |              | Not Filed | \$29,983 (est)     | \$1,176     |
| 3265 | C00616078       | GET OUR JOBS BACK, INC  |                  | STEVEN<br>HOFFENBERG  | \$100,648,528 | 0   |              | Not Filed | \$50,324,263 (est) | \$16,671    |
| 3266 | C00297531       | GOVERNMENT IS NOT GOD   |                  | NANCY<br>MURRAY       | \$124,190     | 0   | 12/19/2016   | 11        | \$5,672            | \$131       |
| 3267 | C00524363       | GREAT LAKES SUPER<br>POLITICAL ACTION<br>COMMITTEE                        |                  | DWIGHT<br>WASHINGTON  | \$157,500     | 0   |              | Not Filed | \$31,500 (est)     | \$1,176     |
| 3268 | C00609859       | ILLINOIS FAMILIES FIRST   |                  | D. PAUL CAPRIO        | \$156,475     | 0   | 1/31/2017    | Not Filed | \$300              | \$300       |
| 3270 | C00291799       | MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITEE-MACPAC |                  | JEFF<br>BUCZKIEWICZ   | \$101,203     | 0   | 1/4/2017     | 27        | \$1,000            | \$195       |
| 3271 | C00577148       | MCCASKILL SENATE FUND   | CLAIRE MCCASKILL | MICHELLE              | \$456,913     | 0   | 1/5/2017     | 28        | \$1,132            | \$201       |
|      |                 |   |                  |                       |               |     |              |           |                    |             |

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| AF#  | Committee      | Committee Name   | Candidate Name | Treasurer              | Threshold   | Ρ | Receipt Date Days Late | Days Late | LOA            | RTB Penalty |
|------|----------------|--|----------------|------------------------|-------------|---|------------------------|-----------|----------------|-------------|
| 3272 | C003           | MECHANICAL<br>CONTRACTORS<br>ASSOCIATION OF AMERICA<br>POLITICAL ACTION<br>COMMITTEE (MCA-PAC) |                | JOHN P.<br>MCNERNEY    | \$338,498   | - | 1/5/2017               | 78        | \$6,100        | \$291       |
| 3273 | C00001180      | MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY                   |                | SCOT F.<br>GOLDBERG    | \$166,784   | 0 | 1/28/2017              | Not Filed | \$8,702 (est)  | \$392       |
| 3274 | C00571950      | MILLENNIALS RISING PAC   |                | MICHELLE               | \$107,521   | 0 | 1/20/2017              | Not Filed | \$185          | \$185       |
| 3275 | C00528026      | NATIONAL CANNABIS<br>INDUSTRY ASSOCIATION<br>PAC   |                | MICHAEL J.<br>CORREIA  | \$143,866   | 0 | 2/16/2017              | Not Filed | \$24,000       | \$654       |
| 3276 | C00111278      | NATIONAL RIGHT TO LIFE<br>POLITICAL ACTION<br>COMMITTEE  |                | WAYNE<br>COCKFIELD     | \$1,231,617 | 0 | 12/16/2016             | 8         | \$355,478      | \$4,995     |
| 3277 | C00509893      | NATIONAL RIGHT TO LIFE<br>VICTORY FUND   |                | WAYNE                  | \$2,419,656 | 0 | 12/20/2016             | 12        | \$512,611      | \$6,797     |
| 3278 | C00427203      | PENINSULA DEMOCRATIC<br>COALITION  | ,              | ZACHERY ROSS           | \$462,578   | 0 | 1/13/2017              | Not Filed | \$2,019        | \$326       |
| 3279 | C00103937      | PHYLLIS SCHLAFLY EAGLE<br>FORUM PAC  |                | JOHN<br>SCHLAFLY       | \$417,239   | 0 | 1/25/2017              | Not Filed | \$2,197        | \$326       |
| 3280 | C00626697      | RIGHTS & DEMOCRACY<br>PROJECT  |                | TRAVEN                 | \$109,264   | 0 | 2/22/2017              | Not Filed | \$97,032       | \$4,862     |
| 3281 | C00574806      | RUN RAY RUN  |                | GIANNI<br>DONATES      | \$312,767   | 0 | 1/15/2017              | Not Filed | \$42,836 (est) | \$1,176     |
| 3282 | C00586180      | RUSS VICTORY FUND  |                | JOHN W.<br>MILLER      | \$4,097,870 | 0 | 1/4/2017               | 27        | \$1,491,744,   | \$14,425    |
| 3283 | C00362632      | SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC  | •              | OFFICE OF<br>TREASURER | \$134,449   | 0 |                        | Not Filed | \$44,816 (est) | \$1,176     |
| 3284 | C00612846      | THE DEMOCRATIC<br>COALITION  |                | FRANCESCA N.<br>LUCIA  | \$247,741   | 0 | 1/18/2017              | Not Filed | \$22,676       | \$654       |
| 3285 | 3285 C00454140 | TURKISH AMERICAN<br>HERITAGE POLITICAL<br>ACTION COMMITTEE -<br>TURKISHPAC                     |                | TEKIN KUNT             | \$130,568   | 0 | 12/20/2016             | 12        | \$16,910       | \$211       |

# BEFORE THE FEDERAL ELECTION COMMISSION

| In the Matter of   | )                 |
|--|-------------------|
| Reason To Believe Recommendation - 2016                            | )                 |
|  | )                 |
| 30 Day Post-General Report (Unauthorized                           | )                 |
| Filers) for the Administrative Fine Program:                       | )<br>AF# 3253     |
| AMERICA COMES FIRST PAC, and                                       | ) Ar# 3233        |
| SCHAMENS, DAVID W MR. as treasurer; ARTICLE 1 POLITICAL ACTION     | )<br>) AF# 3254   |
|  | ) AF# 3234        |
| COMMITTEE, and GALENA, RICK as                                     | )                 |
| treasurer;   | )<br>) AF# 3255   |
| BELIEVE IN LIFE LIBERTY YOURSELF                                   | ) Ar# 3233        |
| (BILLY PAC), and TAYLOR, JERED as                                  | )                 |
| treasurer;   | ) .<br>) AF# 3256 |
| BRADY VICTORY FUND, and  | ) Ar# 3230        |
| KARLINS, MICHAEL J as treasurer;<br>CITIZENS SUPER PAC FOR AMERICA | )<br>) AF# 3257   |
|  | ) Ar# 3231        |
| (CSPAC), and SIDDIQ MUMIN as                                       | )                 |
| treasurer; COMMUNICATION WORKERS OF                                | )<br>) AF# 3258   |
|  | ) AT# 3236        |
| AMERICA LOCAL 13000, and   | )                 |
| MACCRORY, MARISA as treasurer;<br>CONNELL FOLEY PAC A NEW JERSEY   | )<br>AF# 3259     |
| NON-PROFIT CORPORATION, and  | ) Ar# 3233        |
| JOHN P LACEY as treasurer;   | )                 |
| DC REPUBLICAN PARTY FEDERAL  | )<br>AF# 3260     |
| ACCOUNT, and JOHNSON, RODERICK                                     | ) Al# 3200        |
| as treasurer;  |                   |
| FARMERS' RICE COOPERATIVE FUND.                                    | ) AF# 3261        |
| and TANIMOTO, BILL as treasurer;                                   | ) Al# 5201        |
| FLORIDIANS FOR A GOOD ECONOMY,                                     | )<br>AF# 3262     |
| and ROBINSON, ERIC W as treasurer;                                 | ) AI# 3202        |
| FRESNO COUNTY DEMOCRATIC   | ) AF# 3263        |
| WOMEN'S CLUB/DEMOCRATS IN  | ) A1 11 5205      |
| ACTION, and WOODY, SHARLYN MS as                                   | \<br>\            |
| treasurer;   | 1                 |
| FROZEN FOOD POLITICAL ACTION                                       | ) AF# 3264        |
| COMMITTEE, and REICH BODOR,  | )                 |
| ALISON as treasurer;   | <b>`</b>          |
| and of the month of  | ,                 |

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|--|----------|-------------|
| GET OUR JOBS BACK, INC, and HOFFENBERG, STEVEN as treasurer; | )        | AF# 3265    |
| GOVERNMENT IS NOT GOD, and                                   | į        | AF# 3266    |
| MURRAY, NANCY as treasurer; GREAT LAKES SUPER POLITICAL      | )        | AF# 3267    |
| ACTION COMMITTEE, and DWIGHT WASHINGTON as treasurer;        | )        |             |
| ILLINOIS FAMILIES FIRST, and                                 | )        | AF# 3268    |
| CAPRIO, D PAUL as treasurer;                                 | )        |             |
| MASON CONTRACTORS ASSOCIATION OF AMERICA                     | )        | AF# 3270    |
| POLITICAL ACTION COMMITEE-                                   | ,        |             |
| MACPAC, and JEFF BUCZKIEWICZ as                              | 7        |             |
| treasurer;   | Ś        |             |
| MCCASKILL SENATE FUND, and                                   | Ś        | AF# 3271    |
| MICHELLE SHEROD as treasurer;                                | Ś        |             |
| MECHANICAL CONTRACTORS                                       | j.       | AF# 3272    |
| ASSOCIATION OF AMERICA                                       | )        |             |
| POLITICAL ACTION COMMITTEE                                   | )        |             |
| (MCA-PAC), and JOHN, MCNERNEY P.                             | )        |             |
| as treasurer;  | )        |             |
| MICHIGAN DOCTORS POLITICAL                                   | )        | AF# 3273    |
| ACTION COMMITTEE - MICHIGAN                                  | )        |             |
| STATE MEDICAL SOCIETY, and SCOT                              | )        |             |
| F. GOLDBERG, MD as treasurer;                                | )        | A TO # 2004 |
| MILLENNIALS RISING PAC, and                                  | )        | AF# 3274    |
| GOODWIN, MICHELLE as treasurer;                              | )        | AF# 3275    |
| NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J.   | ~        | Ar# 32/3    |
| CORREIA as treasurer,  | ,        |             |
| NATIONAL RIGHT TO LIFE POLITICAL                             | ,        | AF# 3276    |
| ACTION COMMITTEE, and  | $\cdot$  |             |
| COCKFIELD, WAYNE as treasurer;                               | `\<br>`\ |             |
| NATIONAL RIGHT TO LIFE VICTORY                               | Ś        | AF# 3277    |
| FUND, and COCKFIELD, WAYNE as                                | Ś        |             |
| treasurer;   | )        | •           |
| PENINSULA DEMOCRATIC   | )        | AF# 3278    |
| COALITION, and ZACHERY ROSS as                               | )        |             |
| treasurer;   | )        |             |
| PHYLLIS SCHLAFLY EAGLE FORUM                                 | )        | AF# 3279    |
| PAC, and SCHLAFLY, JOHN as treasurer;                        | )        |             |
| RIGHTS & DEMOCRACY PROJECT, and                              | )        | AF# 3280    |
| LEYSHON, TRAVEN as treasurer;                                | )        |             |

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| RUN RAY RUN, and GIANNI DONATES  | ` | AF# 3281 |
|----------------------------------|---|----------|
| •                                | • | AL# 320  |
| as treasurer;                    | ) |          |
| RUSS VICTORY FUND, and MILLER,   | ) | AF# 3282 |
| JOHN W. as treasurer;            | ) |          |
| THE DEMOCRATIC COALITION, and    | ) | AF# 3284 |
| LUCIA, FRANCESCA N as treasurer; | ) |          |
| TURKISH AMERICAN HERITAGE        | ) | AF# 3285 |
| POLITICAL ACTION COMMITTEE -     | ) |          |
| TURKISHPAC, and KUNT, TEKIN as   | ) |          |
| reasurer;                        | ) |          |

### CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 29, 2017 the Commission took the following actions on the Reason To Believe Recommendation - 2016 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 28, 2017, on the following committees:

AF#3253 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3254 Decided by a vote of 5-0 to: (1) find reason to believe that ARTICLE 1 POLITICAL ACTION COMMITTEE, and GALENA, RICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3255 Decided by a vote of 5-0 to: (1) find reason to believe that BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC), and TAYLOR, JERED in his official

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capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3256 Decided by a vote of 5-0 to: (1) find reason to believe that BRADY VICTORY FUND, and KARLINS, MICHAEL J in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3257 Decided by a vote of 5-0 to: (1) find reason to believe that CITIZENS SUPER PAC FOR AMERICA (CSPAC), and SIDDIQ MUMIN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3258 Decided by a vote of 5-0 to: (1) find reason to believe that COMMUNICATION WORKERS OF AMERICA LOCAL 13000, and MACCRORY, MARISA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3259 Decided by a vote of 5-0 to: (1) find reason to believe that CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION, and JOHN P LACEY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3260 Decided by a vote of 5-0 to: (1) find reason to believe that DC REPUBLICAN PARTY FEDERAL ACCOUNT, and JOHNSON, RODERICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3261 Decided by a vote of 5-0 to: (1) find reason to believe that FARMERS' RICE COOPERATIVE FUND, and TANIMOTO, BILL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate

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letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3262 Decided by a vote of 5-0 to: (1) find reason to believe that FLORIDIANS FOR A GOOD ECONOMY, and ROBINSON, ERIC W in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3263 Decided by a vote of 5-0 to: (1) find reason to believe that FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION, and WOODY, SHARLYN MS in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3264 Decided by a vote of 5-0 to: (1) find reason to believe that FROZEN FOOD POLITICAL ACTION COMMITTEE, and REICH BODOR, ALISON in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3265 Decided by a vote of 5-0 to: (1) find reason to believe that GET OUR JOBS BACK, INC, and HOFFENBERG, STEVEN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3266 Decided by a vote of 5-0 to: (1) find reason to believe that GOVERNMENT IS NOT GOD, and MURRAY, NANCY in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3267 Decided by a vote of 5-0 to: (1) find reason to believe that GREAT LAKES SUPER POLITICAL ACTION COMMITTEE, and DWIGHT WASHINGTON in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3268 Decided by a vote of 5-0 to: (1) find reason to believe that ILLINOIS FAMILIES FIRST, and CAPRIO, D PAUL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3270 Decided by a vote of 5-0 to: (1) find reason to believe that MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITEE-MACPAC, and JEFF BUCZKIEWICZ in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3271 Decided by a vote of 5-0 to: (1) find reason to believe that MCCASKILL SENATE FUND, and MICHELLE SHEROD in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3272 Decided by a vote of 5-0 to: (1) find reason to believe that MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC), and JOHN, MCNERNEY P. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3273 Decided by a vote of 5-0 to: (1) find reason to believe that MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY, and SCOT F. GOLDBERG, MD in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3274 Decided by a vote of 5-0 to: (1) find reason to believe that MILLENNIALS RISING PAC, and GOODWIN, MICHELLE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3275 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3276 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE, and COCKFIELD, WAYNE in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3277 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL RIGHT TO LIFE VICTORY FUND, and COCKFIELD, WAYNE in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3278 Decided by a vote of 5-0 to: (1) find reason to believe that PENINSULA DEMOCRATIC COALITION, and ZACHERY ROSS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3279 Decided by a vote of 5-0 to: (1) find reason to believe that PHYLLIS SCHLAFLY EAGLE FORUM PAC, and SCHLAFLY, JOHN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3280 Decided by a vote of 5-0 to: (1) find reason to believe that RIGHTS & DEMOCRACY PROJECT, and LEYSHON, TRAVEN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil

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money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3281 Decided by a vote of 5-0 to: (1) find reason to believe that RUN RAY RUN, and GIANNI DONATES in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3282 Decided by a vote of 5-0 to: (1) find reason to believe that RUSS VICTORY FUND, and MILLER, JOHN W. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3284 Decided by a vote of 5-0 to: (1) find reason to believe that THE DEMOCRATIC COALITION, and LUCIA, FRANCESCA N in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3285 Decided by a vote of 5-0 to: (1) find reason to believe that TURKISH AMERICAN HERITAGE POLITICAL ACTION COMMITTEE - TURKISHPAC, and KUNT, TEKIN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 30, 2017

Date

Dayna C. Brown

Secretary and Clerk of the Commission



March 31, 2017

Zachery Ross, in official capacity as Treasurer Peninsula Democratic Coalition 1360 Emerson Street Palo Alto, CA 94301

C00427203 AF#: 3278

Dear Mr. Ross:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 20, 2016 through November 28, 2016 shall be filed no later than December 8, 2016. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On March 29, 2017, the FEC found that there is reason to believe ("RTB") that Peninsula Democratic Coalition and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before December 8, 2016. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$326. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See http://www.fec.gov/af/af.shtml. 11 CFR § 111.34. Your payment of \$326 is due within forty (40) days of the finding, or by May 8, 2017, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$2,019

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are

considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 8, 2017. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. Id. Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

# 2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Peninsula Democratic Coalition and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

# 3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

# NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

# 4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

### 5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at http://www.fec.gov/af/af.shtml. If you have questions regarding the payment of the calculated civil money penalty, please contact Aimee Wechsler in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Steree Swatter

Steven T. Walther

Chair

## ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$326 for the 2016 Post-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission P.O. Box 979058 St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox FEC #979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

### PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

# PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Peninsula Democratic Coalition

FEC ID#: C00427203

AF#: 3278

PAYMENT DUE DATE: May 8, 2017

PAYMENT AMOUNT DUE: \$326



# **SENSITIVE**

July 3, 2017

### **MEMORANDUM**

TO:

The Commission

THROUGH:

Alec Palmer AP. for AP

Staff Director

FROM:

Patricia C. Orrock DC for PCO

Chief Compliance Officer

Debbie Chacona DC Assistant Staff Director Reports Analysis Division

BY:

Kristin D. Roser/Ben Holly

Reports Analysis Division Compliance Branch

SUBJECT:

Final Determination Recommendation -

2016 30 Day Post-General Report (Unauthorized Committees) for the

Administrative Fine Program

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2016 30 Day Post-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, four (4) committees disclosed a level of activity after the K1B finding, which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Citizens SuperPAC for America (CSPAC) (AF 3257) disclosed no activity after the RTB finding (previously estimated to be \$46,542), which would result in no civil money penalty (fine previously assessed to be \$1,470).

Frozen Food Political Action Committee (AF 3264) filed the 2016 30 Day Post-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$110 (previously estimated to be \$29,983), thus the fine would be lowered from \$1,176 to \$110. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund for the difference (\$1,066).

Get Our Jobs Back, Inc. (AF 3265) disclosed no activity after the RTB finding (previously estimated to be \$50,324,263), which would result in no civil money penalty (fine previously assessed to be \$16,671).

Great Lakes Super Political Action Committee (AF 3267) disclosed no activity after the RTB finding (previously estimated to be \$31,500), which would result in no civil money penalty (fine previously assessed to be \$1,176).

For your information, two (2) committees disclosed a change in treasurer after the RTB finding. An overview of these cases is provided below.

Frozen Food Political Action Committee (AF 3264) filed an Amended Statement of Organization after the RTB finding designating Brandon Partridge as Treasurer.

Rights & Democracy Project (AF 3280) filed an Amended Statement of Organization after the RTB finding designating Maria Fitzsimmons as Treasurer.

### **RAD** Recommendation

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission FD Circulation Report Fine Paid 2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

| AF#  | Committee Name  | Candidate Name   | Committee<br>ID | Treasurer            | Receipt<br>Date | Days Late | LOA            | <u>₹</u>   | RTB Date   | RTB Date RTB Penalty Final Money Penalty | Final Money<br>Penalty | Date Paid  | Amount<br>Paid |
|------|---|------------------|-----------------|----------------------|-----------------|-----------|----------------|------------|------------|--|------------------------|------------|----------------|
| 3254 | ARTICLE 1 POLITICAL ACTION<br>COMMITTEE   |                  | C00461624       | RICK GALENA          | 12/29/2016      | 21        | \$27,300       | 0          | 03/29/2017 | \$823                                    | \$823                  | 05/09/2017 | \$823          |
| 3255 | BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC)  |                  | C00559146       | JERED TAYLOR         | 01/26/2017      | Not Filed | \$9,042        | 0          | 03/29/2017 | \$392                                    | \$382                  | 05/02/2017 | \$392          |
| 3256 | BRADY VICTORY FUND  | KEVIN BRADY      | C00531285       | MICHAEL J. KARLINS   | 12/14/2016      | 9         | \$150,642      | 0          | 03/29/2017 | \$2,360                                  | \$2,360                | 04/26/2017 | \$2,360        |
| 3258 |   |                  | C00109595       | MARISA MACCRORY      | 1/5/2017        | 28        | \$23,264       | 0          | 03/29/2017 | \$307                                    | 2307                   | 04/20/2017 | \$307          |
| 3259 | CONNELL FOLEY PAC A NEW<br>JERSEY NON-PROFIT<br>CORPORATION                                 |                  | C00388181       | JOHN P. LACEY        | 1/31/2017       | Not Fired | \$2,500        | 0          | 03/29/2017 | \$326                                    | \$326                  | 04/18/2017 | \$326          |
| 3260 | -   |                  | C00191288       | RODERICK JOHNSON     | 1/17/2017       | Not Filed | \$870          | 0          | 03/29/2017 | \$326                                    | \$326                  | 05/09/2017 | \$326          |
| 3261 | Ŧ.  |                  | C00146605       | BILL TANIMOTO        | 12/16/2016      | 60        | \$8,200        |            | 03/29/2017 | \$113                                    | \$113                  | 05/02/2017 | \$113          |
| 3264 | FROZENE   |                  | C00385740       | BRANDON PARTRIDGE    | 5/8/2017        | Not Filed | \$110          | 0          | 03/29/2017 | \$1,176                                  | \$110                  | 5/2/2017   | \$1,176        |
| 3266 | GOVERNIMENT IS NOT GOD  |                  | C00297531       | NANCY MURRAY         | 12/19/2016      | Ξ         | \$5,672        | 0          | 03/29/2017 | \$131                                    | \$131                  | 04/13/2017 | \$131          |
| 3268 | ILLINOIS FAMILIES FIRST   |                  | C00609859       | D. PAUL CAPRIO       | 1/31/2017       | Not Filed | \$300          | 0          | 03/29/2017 | \$300                                    | \$300                  | 04/11/2017 | \$300          |
| 3270 | MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITEE- MACPAC                  |                  | C00291799       | JEFF BUCZKIEWICZ     | 1/4/2017        | 22        | \$1,000        | 0          | 03/28/2017 | \$195                                    | \$195                  | 04/12/2017 | \$195          |
| 3271 | MCCASKILL SENATE FUND   | CLAIRE MCCASKILL | C00577148       | MICHELLE SHEROD      | 1/5/2017        | 28        | \$1,132        | 0          | 03/29/2017 | \$201                                    | \$201                  | 04/18/2017 | \$201          |
| 3272 | MECHANICAL CONTRACTORS<br>ASSOCIATION OF AMERICA<br>POLITICAL ACTION COMMITTEE<br>(MCA-PAC) |                  | C00343590       | JOHN P. MCNERNEY     | 1/5/2017        | 28        | \$6,100        | 1          | 03/29/2017 | \$291                                    | \$291                  | 05/02/2017 | \$291          |
| 3273 | од  |                  | C00001180       | SCOT F. GOLDBERG, MD |                 | Not Filed | \$8,702 (est)  | 0          | 03/29/2017 | \$392                                    | \$392                  | 05/09/2017 | \$392          |
| 3274 | MILLENNIALS RISING PAC  |                  | C00571950       | MICHELL GOODWIN      | 1/20/2017       | Not Filed | \$185          | 0          | 03/29/2017 | \$185                                    | \$185                  | 04/17/2017 | \$185          |
| 3275 | Z   |                  | C00528026       | MICHAEL J. CORREIA   | 02/16/2017      | Not Filed | \$24,000       | 0          | 03/29/2017 | \$654                                    | \$654                  | 04/17/2017 | \$654          |
| 3276 | NATIONAL RIGHT TO LIFE<br>POLITICAL ACTION COMMITTEE  |                  | C00111278       | WAYNE COCKFIELD      | 12/16/2016      | 80        | \$355,478      | <b>o</b> . | 03/29/2017 | \$4,995                                  | \$4,995                | 05/02/2017 | \$4,995        |
| 3277 |   |                  | C00509893       | WAYNE COCKFIELD      | 12/20/2016      | 12        | \$512,611      | 0          | 03/29/2017 | \$6,797                                  | \$6,797                | 05/02/2017 | \$6,797        |
| 3278 | PEN   |                  | C00427203       | ZACHERY ROSS         | 1/13/2017       | Not Filed | \$2,019        | 0          | 03/29/2017 | \$326                                    | \$326                  | 05/05/2017 | S326           |
| 3280 | RIGHTS & DEMOCRACY PROJECT  |                  | C00826697       | MARIA FITZSIMMONS    | 02/22/2017      | Not Filed | \$97,032       | 0          | 03/29/2017 | \$4,862                                  | \$4,862                | 05/08/2017 | \$4,862        |
| 3281 | RUN RAY RUN   |                  | C00574806       | GIANNI DONATES       | 1/15/2017       | Not Filed | \$42,836 (est) | 0          | 03/29/2017 | \$1,176                                  | \$1,176                | 06/05/2017 | \$1,176        |
| 3282 | RUSS VICTORY FUND   |                  | C00586180       | JOHN W. MILLER       | 1/4/2017        | 27        | \$1,491,744    | 0          | 03/29/2017 | \$14,425                                 | \$14,425               | 04/28/2017 | \$14,425       |

<sup>\*</sup> This committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. This committee paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

Federal Election Commission
FD Circulation Report Fine Not Paid
2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

| Committee Name Candidate Committee                                       | _        | Committee |                 | Treasurer   | Receipt    | Days Late | LOA            | ò | RTR Date   | RTR Penalty | RTR Penalty Days Since | FD Penally    |
|--|----------|-----------|-----------------|-------------|------------|-----------|----------------|---|------------|-------------|------------------------|---------------|
| Name ID  | QI (     |           |                 |             | Date       |           |                | • |            | (man)       | RTB                    | <b>S</b> 1212 |
| AMERICA COMES FIRST C00623256 DAVID W. SCHAMENS                          | DAVID W  | DAVID W   | DAVID W. SCHAME | SNS         | 12/14/2016 | 9         | \$5,491        | 0 | 03/29/2017 | \$101       | 89                     | \$101         |
| CITIZENS SUPER PAC FOR C00496927 SIDDIQ MUMIN                            | adis .   | adis .    | SIDDIQ MUMIN    |             |            | Not Filed | 0\$            | - | 03/29/2017 | \$1,470     | 68                     | NONE          |
| FLORIDIANS FOR A GOOD C00605634 ERIC W. ROBINSON ECONOMY                 | ERIC M   | ERIC M    | ERIC W. ROBIN   | SON         | 1/30/2017  | Not Filed | \$2,380        | 0 | 03/29/2017 | \$326       | 68                     | \$326         |
| FRESNO COUNTY  DEMOCRATIC WOMEN'S  CLUB/DEMOCRATS IN  ACTION             |          |           | SHARLYNWC       | γgo         | 6/26/2017  | Not Filed | . \$19,429     | 0 | 03/29/2017 | \$654       | 68                     | \$654         |
| 3265 GET OUR JOBS BACK, INC C00616078 STEVEN HOFFE                       | STEVEN   | STEVEN    |                 | HOFFENBERG  |            | Not Filed | \$0            | 0 | 03/29/2017 | \$16,671    | 89                     | NONE          |
| GREAT LAKES SUPER POLITICAL ACTION CO0524363 DWIGHT WASHINGTON COMMITTEE |          |           | DWIGHT WASHIN   | GTON        |            | Not Filed | \$0            | 0 | 03/29/2017 | \$1,176     | 88                     | NONE          |
| 3279 PHYLLIS SCHLAFLY EAGLE C00103937 JOHN SCHLAFLY FORUM PAC            | NHOS     | NHOS      | JOHN SCHL       | AFLY        | 1/25/2017  | Not Filed | \$2,197        | 0 | 03/29/2017 | \$326       | 88                     | \$326         |
| SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC                      | OFFICE 0 | OFFICE 0  | OFFICE OF TRI   | F TREASURER |            | Not Filed | \$44,816 (est) | 0 | 03/29/2017 | \$1,176     | 88                     | \$1,176       |
| THE DEMOCRATIC C00612846 FRANCESCA N. LUCIA                              | L        | L         | FRANCESCA       | V. LUCIA    | 1/18/2017  | Not Filed | \$59,195       | 0 | 03/29/2017 | \$654       | 89                     | \$654         |
| 3285 HERITAGE POLITICAL C00454140 TEKIN KUNT TURKISHPAC                  |          |           | TEKIN KU        | Į.          | 12/20/2016 | 12        | \$16,910       | 0 | 03/29/2017 | \$211       | 68                     | \$211         |

# BEFORE THE FEDERAL ELECTION COMMISSION

| In the Matter of                        | )        |          |
|---|----------|----------|
| •                                       | )        |          |
| Withdrawal and Resubmission of Final    | )        |          |
| Determination Recommendation - 2016 30  | )        |          |
| Day Post-General Report (Unauthorized   | )        |          |
| Committees) for the Administrative Fine | )        |          |
| Program:                                | )        |          |
| AMERICA COMES FIRST PAC, and            | )        | AF# 3253 |
| SCHAMENS, DAVID W MR. as treasurer;     | )        |          |
| ARTICLE 1 POLITICAL ACTION              | )        | AF# 3254 |
| COMMITTEE, and GALENA, RICK as          | j.       |          |
| treasurer;                              | Ś        |          |
| BELIEVE IN LIFE LIBERTY YOURSELF        | ·Ś       | AF# 3255 |
| (BILLY PAC), and TAYLOR, JERED as       | Ś        |          |
| treasurer;                              | Ś        |          |
| BRADY VICTORY FUND, and                 | Ś        | AF# 3256 |
| KARLINS, MICHAEL J as treasurer;        | Ś        |          |
| COMMUNICATION WORKERS OF                | í        | AF# 3258 |
| AMERICA LOCAL 13000, and                | í        |          |
| MACCRORY, MARISA as treasurer;          | í        |          |
| CONNELL FOLEY PAC A NEW JERSEY          | Ś        | AF# 3259 |
| NON-PROFIT CORPORATION, and             | Ś        |          |
| JOHN P LACEY as treasurer;              | í        |          |
| DC REPUBLICAN PARTY FEDERAL             | í        | AF# 3260 |
| ACCOUNT, and JOHNSON, RODERICK          | ń        |          |
| as treasurer;                           | Ś        |          |
| FARMERS' RICE COOPERATIVE FUND,         | Ś        | AF# 3261 |
| and TANIMOTO, BILL as treasurer;        | Ś        |          |
| FLORIDIANS FOR A GOOD ECONOMY,          | ).       | AF# 3262 |
| and ROBINSON, ERIC W as treasurer;      | í        |          |
| FRESNO COUNTY DEMOCRATIC                | í        | AF# 3263 |
| WOMEN'S CLUB/DEMOCRATS IN               | <u>`</u> |          |
| ACTION, and WOODY, SHARLYN MS as        | í        |          |
| treasurer;                              | í        |          |
| GOVERNMENT IS NOT GOD, and              | Ś        | AF# 3266 |
| MURRAY, NANCY as treasurer;             | Ś        |          |
| ILLINOIS FAMILIES FIRST, and            | Ś        | AF# 3268 |
| CAPRIO, D PAUL as treasurer;            | í        | _:       |
| · · · · · · · · · · · · · · · · · · ·   | •        |          |

| Federal Election Commission            |
|--|
| Certification for Administrative Fines |
| July 06, 2017                          |

| MASON CONTRACTORS                     | ) | AF# 3270 |
|---------------------------------------|---|----------|
| ASSOCIATION OF AMERICA                | ) |          |
| POLITICAL ACTION COMMITEE-            | ) |          |
| MACPAC, and JEFF BUCZKIEWICZ as       | ) |          |
| treasurer;                            | ) |          |
| MCCASKILL SENATE FUND, and            | ) | AF# 3271 |
| MICHELLE SHEROD as treasurer;         | ) |          |
| MECHANICAL CONTRACTORS                | ) | AF# 3272 |
| ASSOCIATION OF AMERICA                | ) |          |
| POLITICAL ACTION COMMITTEE            | ) |          |
| (MCA-PAC), and JOHN, MCNERNEY P.      | ) |          |
| as treasurer;                         | ) |          |
| MICHIGAN DOCTORS POLITICAL            | ) | AF# 3273 |
| ACTION COMMITTEE - MICHIGAN           | ) |          |
| STATE MEDICAL SOCIETY, and SCOT       | ) |          |
| F. GOLDBERG, MD as treasurer;         | ) |          |
| MILLENNIALS RISING PAC, and           | ) | AF# 3274 |
| GOODWIN, MICHELLE as treasurer;       | ) |          |
| NATIONAL CANNABIS INDUSTRY            | ) | AF# 3275 |
| ASSOCIATION PAC, and MICHAEL J.       | ) |          |
| CORREIA as treasurer;                 | ) |          |
| NATIONAL RIGHT TO LIFE POLITICAL      | ) | AF# 3276 |
| ACTION COMMITTEE, and                 | ) |          |
| COCKFIELD, WAYNE as treasurer;        | ) |          |
| NATIONAL RIGHT TO LIFE VICTORY        | ) | AF# 3277 |
| FUND, and COCKFIELD, WAYNE as         | ) |          |
| treasurer;                            | ) |          |
| PENINSULA DEMOCRATIC                  | ) | AF# 3278 |
| COALITION, and ZACHERY ROSS as        | ) |          |
| treasurer;                            | ) |          |
| PHYLLIS SCHLAFLY EAGLE FORUM          | ) | AF# 3279 |
| PAC, and SCHLAFLY, JOHN as treasurer; | ) |          |
| RUN RAY RUN, and GIANNI DONATES       | ) | AF# 3281 |
| as treasurer;                         | ) |          |
| RUSS VICTORY FUND, and MILLER,        | ) | AF# 3282 |
| JOHN W. as treasurer;                 | ) |          |
| THE DEMOCRATIC COALITION, and         | ) | AF# 3284 |
| LUCIA, FRANCESCA N as treasurer;      | ) |          |
| TURKISH AMERICAN HERITAGE             | ) | AF# 3285 |
| POLITICAL ACTION COMMITTEE -          | ) |          |
| TURKISHPAC, and KUNT, TEKIN as        | ) |          |
| treasurer;                            | ) |          |
|                                       |   |          |

# **CERTIFICATION**

- I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 06, 2017 the Commission took the following actions on the Withdrawal and Resubmission of Final Determination Recommendation 2016

  30 Day Post-General Report (Unauthorized Committees) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated July 03, 2017, on the following committees:
- AF#3253 Decided by a vote of 5-0 to: (1) make a final determination that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.
- AF#3254 Decided by a vote of 5-0 to: (1) make a final determination that ARTICLE 1 POLITICAL ACTION COMMITTEE, and GALENA, RICK in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.
- AF#3255 Decided by a vote of 5-0 to: (1) make a final determination that BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC), and TAYLOR, JERED in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.
- AF#3256 Decided by a vote of 5-0 to: (1) make a final determination that BRADY VICTORY FUND, and KARLINS, MICHAEL J in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.
- AF#3258 Decided by a vote of 5-0 to: (1) make a final determination that COMMUNICATION WORKERS OF AMERICA LOCAL 13000, and MACCRORY, MARISA in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3259 Decided by a vote of 5-0 to: (1) make a final determination that CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION, and JOHN P LACEY in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3260 Decided by a vote of 5-0 to: (1) make a final determination that DC REPUBLICAN PARTY FEDERAL ACCOUNT, and JOHNSON, RODERICK in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3261 Decided by a vote of 5-0 to: (1) make a final determination that FARMERS' RICE COOPERATIVE FUND, and TANIMOTO, BILL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3262 Decided by a vote of 5-0 to: (1) make a final determination that FLORIDIANS FOR A GOOD ECONOMY, and ROBINSON, ERIC W in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3263 Decided by a vote of 5-0 to: (1) make a final determination that FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION, and WOODY, SHARLYN MS in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3266 Decided by a vote of 5-0 to: (1) make a final determination that GOVERNMENT IS NOT GOD, and MURRAY, NANCY in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3268 Decided by a vote of 5-0 to: (1) make a final determination that ILLINOIS FAMILIES FIRST, and CAPRIO, D PAUL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission Certification for Administrative Fines July 06, 2017

AF#3270 Decided by a vote of 5-0 to: (1) make a final determination that MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITEE-MACPAC, and JEFF BUCZKIEWICZ in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3271 Decided by a vote of 5-0 to: (1) make a final determination that MCCASKILL SENATE FUND, and MICHELLE SHEROD in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3272 Decided by a vote of 5-0 to: (1) make a final determination that MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC), and JOHN, MCNERNEY P. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3273 Decided by a vote of 5-0 to: (1) make a final determination that MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY, and SCOT F. GOLDBERG, MD in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3274 Decided by a vote of 5-0 to: (1) make a final determination that MILLENNIALS RISING PAC, and GOODWIN, MICHELLE in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3275 Decided by a vote of 5-0 to: (1) make a final determination that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3276 Decided by a vote of 5-0 to: (1) make a final determination that NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE, and COCKFIELD, WAYNE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3277 Decided by a vote of 5-0 to: (1) make a final determination that NATIONAL RIGHT TO LIFE VICTORY FUND, and COCKFIELD, WAYNE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3278 Decided by a vote of 5-0 to: (1) make a final determination that PENINSULA DEMOCRATIC COALITION, and ZACHERY ROSS in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3279 Decided by a vote of 5-0 to: (1) make a final determination that PHYLLIS SCHLAFLY EAGLE FORUM PAC, and SCHLAFLY, JOHN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3281 Decided by a vote of 5-0 to: (1) make a final determination that RUN RAY RUN, and GIANNI DONATES in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3282 Decided by a vote of 5-0 to: (1) make a final determination that RUSS VICTORY FUND, and MILLER, JOHN W. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3284 Decided by a vote of 5-0 to: (1) make a final determination that THE DEMOCRATIC COALITION, and LUCIA, FRANCESCA N in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3285 Decided by a vote of 5-0 to: (1) make a final determination that TURKISH AMERICAN HERITAGE POLITICAL ACTION COMMITTEE - TURKISHPAC, and KUNT, TEKIN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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Attest:

Dayna C. Brown

Secretary and Clerk of the Commission

July 7, 2017

Zachery Ross, in official capacity as Treasurer Peninsula Democratic Coalition 1360 Emerson Street Palo Alto, CA 94301

C00427203 AF#: 3278

Dear Mr. Ross:

On March 29, 2017, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Peninsula Democratic Coalition and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2016 Post-General Report. By letter dated March 31, 2017, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$326 in accordance with the schedule of penalties at 11 CFR § 111.43.

On May 5, 2017, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on July 6, 2017 that Peninsula Democratic Coalition and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$326 in accordance with 11 CFR § 111.43, and voted to close the file.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Aimee Wechsler on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission.

Steven T. Walther

Chair

| PENINSULA DEMOCRATIC COALITION/FED 635 HOPE ST MOUNTAIN VIEW: CA 94041-2033 COOTE 7203 DATE 4129/2017  PAY FRAY ORDER OF FEDERAL Election Commission  \$ 326 | 3770 SA/1210 CA |
|--|-----------------|
| Three hundred twenty six and go DOLLARS  |                 |
| Bank of America  ACH BY 1219000300  FOR: A F = 3 2 7 8   |                 |
|  |                 |

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3278